

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

Chapter 9

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Debtor

Hon. Steven W. Rhodes

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**EX-PARTE MOTION TO ALLOW LATE FILING OF OBJECTION  
BY ROBERT COLE TO THE FOURTH AMENDED PLAN  
FOR THE ADJUSTMENT OF DEBTS FOR THE CITY OF DETROIT**

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Benjamin J. Wilensky, on behalf of ROBERT COLE files this Ex-Parte Motion to Allow the Filing of the Objection by Robert Cole to the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (Dkt. No. 4930, copy with corrected docket text at Dkt. No. 4950). In support of this Motion, counsel states as follows:

1. Counsel for Mr. Cole has not been regularly involved in these bankruptcy proceedings and was not part of the electronic distribution system.
2. Counsel was first served with the proposed plan on May 15, 2014.
3. Principal counsel for Mr. Cole, Larry Bennett, was not in the office on May 15 or May 16.
4. The Objection to the Plan was filed on May 19, 2014, the first business day counsel was in his office after service of the Fourth Amended Plan for the Adjustment of Debts for the City of Detroit.

**RELIEF REQUESTED**

Mr. Cole requests that the Court allow the Objection by Robert Cole which was filed within four (4) days of receipt of the Fourth Amended Plan.

Respectfully submitted,

/s/ Benjamin J. Wilensky  
Larry W. Bennett (P26294)  
Benjamin J. Wilensky (P75302)  
**SEIKALY & STEWART, P.C.**  
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Dated: May 27, 2014.

### CERTIFICATE OF SERVICE

I hereby certify that on May 127, 2014, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to all ECF participants. I hereby certify that I have mailed the foregoing document(s) by United States Postal Service to the following:

Bruce Bennett  
Jones Day  
555 South Flower Street  
Fiftieth Floor  
Los Angeles, CA 90071

/s/ Benjamin J. Wilensky  
\_\_\_\_\_  
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